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Experian Information Solutions, Inc.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**EXPERIAN INFORMATION SOLUTIONS,  
INC.,** )  
                        ) )  
                        ) )  
*Plaintiff,* ) ) Case No. 15-cv-\_\_\_\_\_  
                        ) )  
                        ) )  
                        ) )  
                        ) )  
**v.** ) ) COMPLAINT  
                        ) )  
**LIST SERVICES DIRECT, INC.,** ) ) (Jury Trial Demanded)  
                        ) )  
*Defendant.* ) )  
                        ) )

## **Complaint**

Plaintiff, EXPERIAN INFORMATION SOLUTIONS, INC. (“Experian” or “Plaintiff”), by its undersigned attorneys, complains and alleges against defendant LIST SERVICES DIRECT, INC. (“LSDI”) as follows:

## Nature of the Case

1. For many years, Experian and its affiliated entities have been industry leaders in the collection and licensing of information concerning consumers and the distribution of consumer information and lists for advertising and other business purposes. Experian and its affiliated entities have continually refined their collection and compilation methods to create one of the premier and best known consumer databases of marketing information, known as the

ConsumerView Database. The ConsumerView Database, which recently was renamed from the InSource Database, is the nation's highest quality repository of consumer marketing information. Experian owns intellectual property rights relating to or embodied in the ConsumerView Database, including copyright, trademark rights, and trade secrets.

2. Experian has become aware that LSDI is unlawfully copying, selling or licensing, and distributing the ConsumerView Database, or portions of the ConsumerView Database, without Experian's permission or authority.

### **The Parties**

3. Experian is a corporation organized under the laws the State of Ohio with a principal place of business located at 475 Anton Blvd., in Costa Mesa, California. Therefore, Experian is a citizen of Ohio and California.

4. Among other things, Experian and its related entities license marketing lists and provide other marketing services to direct marketers using information derived from its proprietary database of consumer information known as the ConsumerView Database.

5. LSDI is a corporation organized under the laws of the State of New Jersey with its principal place of business at Two Christie Heights Street, Leonia, New Jersey. Therefore, LSDI is a citizen of New Jersey.

### **Jurisdiction and Venue**

6. This action arises under the Copyright Act, 17 U.S.C. §§ 101, *et seq.* and New Jersey statutory and common law.

7. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between Experian, a citizen of Ohio and California, and LSDI, a citizen of New Jersey.

8. This Court has original jurisdiction under 28 U.S.C. §§ 1331 and 1338(a). In the alternative, this Court has original jurisdiction under 28 U.S.C. § 1332.

9. This Court has supplemental jurisdiction under 28 U.S.C. § 1337 over the claims arising under New Jersey statutory and common law because it is so related to the claim for copyright infringement that they form part of the same case or controversy.

10. LSDI is incorporated in New Jersey and regularly conducts business within this judicial district. LSDI has also committed the acts complained of herein by copying, selling, offering for sale, and/or distributing Experian's copyrighted works and trade secrets within this judicial district on information and belief, LSDI has also prepared and distributed derivative works of Experian's copyrighted database within this judicial district. LSDI is therefore subject to personal jurisdiction in this district.

11. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400.

#### **Background Facts**

12. Experian and its affiliated entities employ approximately 15,500 people in 38 countries, supporting clients in more than 65 countries.

13. Experian and its affiliated entities maintain demographic information on approximately 215 million consumers in 110 million living units across the United States.

#### **The ConsumerView Database**

14. Experian selects, coordinates, and arranges consumer information into a comprehensive database known as the ConsumerView Database. Experian collects and compiles consumer information directly from more than 2,200 proprietary sources. Examples of the consumer information that Experian collects and compiles include, without limitation, biographical information, employment history, educational background, real estate transactions, information regarding the presence of children in a household, historical information concerning

residential addresses, mail order buying history, internet related information, and self-reported consumer behaviors. Experian employees rigorously investigate the consumer information from more than 2,200 sources in order to determine whether, in Experian's business judgment, the source and the information are credible and accurate.

15. For example, in some instances the consumer information Experian collects from a specific source will conflict with the consumer information contained in a different source. Experian utilizes its business judgment, analytics, and technological tools to reconcile these conflicts in order to enhance the reliability of the consumer information in the ConsumerView Database.

16. Experian also creates and includes in the ConsumerView Database original information that is specific to individual consumers. The original information relates to consumer behavior that Experian derives from inferences, conclusions, and business judgments based on the consumer information it collects and compiles. Examples of such consumer behavior include predictors concerning the likelihood a consumer will relocate within a particular period of time and whether children are present in a household.

17. Before any source is added to the ConsumerView Database, Experian rigorously evaluates the consumer information for cleanliness, coverage depth, recency, and accuracy. In particular, Experian and its affiliated entities apply original and proprietary algorithms, models, analytical tools, and Experian's business judgment to determine which consumer information to select, to resolve conflicts between sources, and to identify which pieces of consumer information are coordinated with other pieces of consumer information. Experian and its affiliated entities update the ConsumerView Database nearly 24 hours a day, 7 days a week, to enhance the currency of the information maintained in the ConsumerView database.

18. Experian alone created, designed, and authored the selection, coordination, and arrangement of the consumer information contained in the ConsumerView Database.

19. The ConsumerView Database is fixed in a tangible medium.

20. The ConsumerView Database constitutes an original work of authorship of Experian. Experian is the owner of all right, title, and interest in the copyrights in the ConsumerView Database.

21. Experian registered the ConsumerView Database with the United States Copyright Office. Exhibit 1 to this Complaint is a true and correct copy of the Certificate of Registration of the ConsumerView Database, Registration No. TX0007499062. Exhibit 2 to this Complaint are true and correct copies of the Certificates of Registration of the ConsumerView Database, Registration Nos. TX0007907664, TX0007904696, TX0007904681, TX0007907903, TX0007907879, TX0007907872, TX0007907680, TX0007907856, and TX0007905616

### **Experian's Business Practices**

22. The selection, coordination, arrangement, and compilation of consumer information in the ConsumerView Database is not generally known to others and commands significant commercial value from not being generally known to others and not being readily ascertainable by proper means. The consumer information contained in the ConsumerView Database as well as the selection, coordination, arrangement, and compilation of the consumer information is not generally known to the public or to competitors who could obtain great economic value from the information.

23. Experian and its related entities license and market the ConsumerView Database, related products, and services on a national basis, including in New Jersey, directly to end user

clients (“Experian End Users”) and through authorized resellers (“Experian Authorized Resellers”).

24. Experian and its related entities also license customized segments of consumer information from the ConsumerView Database to others in the consumer information industry.

25. Experian and its affiliated entities invest millions of dollars annually to acquire, analyze, and process consumer information directly from original sources, both public and proprietary.

26. Experian undertakes significant efforts to control and maintain the secret and proprietary nature of the ConsumerView Database. Experian and its related entities do not display the ConsumerView Database, the consumer information within the ConsumerView Database, or the methodology Experian employs to create the ConsumerView Database on its website or in other advertising literature to the public at large. Experian uses rigorous security methods to ensure that the ConsumerView Database is only accessible to authorized employees. Gaining access to the ConsumerView Database requires the use of security badges, secured user accounts, and authentication through additional security measures.

27. Experian End Users are contractually bound to handle information from the ConsumerView Database under strict terms and conditions (including confidentiality and security requirements) that restrict access to the information from the ConsumerView Database to entities/individuals who are licensed or otherwise authorized by Experian and its affiliated entities to use the consumer information contained in the ConsumerView Database. Experian also requires that Experian End Users implement specific security measures to protect against unauthorized access to the ConsumerView Database. For example, Experian End Users are prohibited from storing data from the ConsumerView Database on desktops or laptops without

Experian's prior written permission. Experian End Users are required to use only industry-standard encryption technology and industry-recognized best practices to secure the ConsumerView Database and/or consumer information from the ConsumerView Database and to secure the communication channels and/or networks that have access to the ConsumerView Database and/or consumer information from the ConsumerView Database.

28. Experian Authorized Resellers are all contractually bound to handle and distribute information from the ConsumerView Database under strict terms and conditions (including confidentiality and security requirements) that prohibit the distribution of information from the ConsumerView Database to persons other than authorized users who have obtained a license to use the consumer information contained in the ConsumerView Database. Experian also requires that Experian Authorized Resellers implement specific security measures to protect against unauthorized access to the ConsumerView Database. For example, Experian Authorized Resellers may only disseminate information from the ConsumerView Database to licensed users over the Internet under certain specified secure conditions and must obtain Experian's prior written permission before doing so. Experian Authorized Resellers are required to use only industry-standard encryption technology and industry-recognized best practices to secure the ConsumerView Database and/or consumer information from the ConsumerView Database and to secure the communication channels and/or networks that have access to the ConsumerView Database and/or consumer information from the ConsumerView Database.

29. Experian and its affiliated entities require that anyone seeking to become an Experian Authorized Reseller commit in writing to, among other things, implement strict security measures to safeguard the ConsumerView Database from unauthorized access. Experian and its affiliated entities also require its Experian Authorized Resellers to allow

auditing of their books, records, and security measures to ensure that the Experian Authorized Resellers comply with all the obligations under their reseller agreements.

30. The Experian Authorized Resellers must also abide by the terms and conditions of the licensing of the ConsumerView Database, that specifically prohibit its use as a reference file to commingle consumer information from the ConsumerView Database with non-Experian information. The terms and conditions also prohibit the repackaging and repurposing of the consumer information contained in the ConsumerView Database to create a different database or marketing list.

#### **LSDI's Business Practices**

31. LSDI is a vendor of consumer data lists. LSDI describes itself on its website as “a full range list services firm providing qualified names for all your prospecting needs.” LSDI also claims on its website to have “over twenty-five years of experience and advance expertise” even though the records from the Secretary of State of New Jersey show that LSDI was incorporated in 1996.

32. LSDI sells or licenses consumer information to other companies for marketing purposes. One of LSDI’s customers is Nationwide Marketing Services, Inc. (“Natimark”). In or around 2011, LSDI began selling Natimark a database containing consumer information (the “Accused Database”). Since then, LSDI has continuously sold and distributed quarterly updates of the Accused Database to Natimark. Natimark in turn resells the data in the Accused Database for marketing purposes.

33. Since at least January 2011, LSDI has provided quarterly updates of the Accused Database to Natimark, which Natimark calls its “National Consumer List.” LSDI delivers these updates to Natimark by copying the Accused Database to either physical discs or over the

internet using the File Transfer Protocol (“FTP”). Upon information and belief, such updates contain copies of at least portions of the ConsumerView Database, including Experian’s copyrighted selections and coordination of names and addresses, or derivative works prepared from the ConsumerView Database, without Experian’s authorization.

34. Upon information and belief, LSDI’s Accused Database contains one or more of copyrighted selections, coordinations, arrangements, or compilation of consumer information as Experian’s ConsumerView Database. These selections, coordinations, arrangements, or compilation of consumer information are not original to LSDI. Upon further information and belief, LSDI copies and sells or otherwise distributes one or more of the copyrighted selections, coordinations, arrangements, or compilation of consumer information to LSDI’s customers, including Natimark.

35. Upon information and belief, LSDI’s Accused Database contains copies of at least portions of the ConsumerView Database or derivative works prepared therefrom that LSDI obtained without Experian’s authorization. Upon information and belief, LSDI has copied and incorporated into the Accused Database at least Experian’s copyrighted selection of names, copyrighted selection of addresses, and copyrighted coordination of names and addresses.

36. Furthermore, these copies of the Accused Database contain Experian’s protected secrets. Upon information and belief, LSDI acquired the Accused Database and/or the information in the Accused Database through improper means.

37. Upon information and belief, LSDI knows or should know that the Accused Database was acquired by improper mean. LSDI sells the Accused Database to resellers such as Natimark without any terms or condition on the use or redistribution of the Accused Database or the data in the Accused Database. LSDI also sells the Accused Database to resellers such as

Natimark at prices far below industry standard. In or about May 2013, LSDI's owner, Micah Raskin, represented to Experian that LSDI's source for the Accused Database was another data compiler, Axciom, but Axciom terminated LSDI's contract in 2011 and denies that LSDI has any right to possession of Axciom's data. Furthermore, in response to subpoenas to LSDI issued in the course of Experian's litigation with Natimark, LSDI refused to provide the source of the Accused Database (even though it has previously claimed the supplier was Axciom) or otherwise verify the supposed legitimacy of the Accused Database.

38. LSDI markets its Accused Database directly to end users of marketing lists and to resellers ("LSDI Resellers"), including Natimark, to solicit orders for licensing or purchasing data from the Accused Database. LSDI also offers to license or sell selections of consumer information from the Accused Database ("List Products") directly to end users and through LSDI Resellers. LSDI Resellers, including Natimark, have solicited licenses to and sold List Products from the Accused Database to end users of marketing data and to compilers of data. On information and belief, LSDI provides LSDI Resellers with consumer information in the Accused Database, including at least the selections and coordination of names and addresses. On information and belief, LSDI Resellers then provide to their customers copies of the selections, coordinations, arrangements, or compilation of the consumer data in the Accused Database.

39. LSDI has created and continues to create copies of the Accused Database to fulfill orders for List Products that include specific consumer information. Upon information and belief, LSDI's Accused Database and List Products created from the Accused Database include one or more of the same selections, coordinations, arrangements, or compilation of consumer information as Experian's copyrighted ConsumerView Database. On information and belief, each copy of the Accused Database and each List Product created from the Accused Database

contain at least copies of Experian's copyrighted selection and coordination of names and addresses.

40. Upon information and belief, LSDI has also and continues to unjustly derive revenue from Experian's copyright and trade secret protected information. Upon information and belief, LSDI uses Experian's consumer information including at least Experian's selections and coordinations of names and addresses as inputs in statistical modeling. Upon further information and belief, LSDI uses statistical modeling to create derivative works from Experian's copyrighted selections and coordinations of consumer information and to unjustly profit from Experian's trade secrets.

**COUNT I**  
**Copyright Infringement**

41. Plaintiff incorporates by reference the allegations of Paragraphs 1–40 of this Complaint as though fully set forth herein.

42. Experian owns a valid and enforceable copyright and U.S. Copyright Registration No. TX0007499062 for its works entitled "InSource Database" and U.S. Copyright Registration Nos. TX0007907664, TX0007904696, TX0007904681, TX0007907903, TX0007907879, TX0007907872, TX0007907680, TX0007907856, and TX0007905616 for its works entitled "ConsumerView Database." Ex. 2.

43. LSDI copied the ConsumerView Database or portions thereof to create the Accused Database, including the selection, coordination, arrangement, and compilation of the consumer information stored in the InSource Database onto its servers, one or more FTP sites, and one or more physical discs, without Experian's authorization.

44. LSDI distributed the Accused Database, including the selection, coordination, arrangement, and compilation of the consumer information stored in the InSource Database, without Experian's authorization.

45. LSDI sold or licensed the Accused Database, including Experian's copyrighted selections, coordinations, arrangements, or compilations of consumer information without Experian's authorization.

46. LSDI has prepared one or more derivative works from Experian's copyrighted selections, coordinations, arrangements, or compilations of consumer information without Experian's authorization.

47. LSDI's unauthorized reproduction, distribution, and sale/licensing of Experian's copyrighted work and the creation, reproduction, distribution and sale of a derivative work constitute copyright infringement in violation of 17 U.S.C. § 501.

48. Despite Experian's exclusive rights to the work entitled "InSource Database" LSDI has directly infringed Experian's copyright to the InSource Database and has induced and/or contributed to the infringement of Experian's copyright to the InSource Database by others.

49. LSDI's copyright infringement has been willful, knowing, and intentional.

50. LSDI's copyright infringement has caused irreparable harm to Experian that cannot be easily ascertained.

51. Unless enjoined by the Court, LSDI will continue to do the acts complained of herein and cause damage and injury, all to Experian's irreparable harm and LSDI's unjust enrichment.

### **Prayer for Relief**

Experian respectfully requests that the Court enter judgment in favor of Experian and against LSDI granting the following relief:

- a) a judgment that LSDI has directly infringed, induced infringement of, or contributed to the infringement of Experian's copyrighted work;
- b) an injunction pursuant to 17 U.S.C. § 502 against LSDI, its officers, agents, servants, employees, successors, assigns, parents, subsidiaries, affiliated or related companies, attorneys, and all others in active concert or participation with LSDI or who receive notice of such injunction, permanently enjoining and restraining them from making, selling, or from advertising products including Experian's copyrighted work, or otherwise infringing Experian's copyrights;
- c) an order that LSDI be directed to file with the Court, and to serve on Experian, within thirty (30) days after entry of the above injunction, a report in writing, under oath, setting forth in detail the manner and form in which LSDI has complied with the injunction;
- d) an order that LSDI be directed to deliver up to this Court for destruction, pursuant to 17 U.S.C. § 503, all products, databases, consumer lists, packaging, prints, advertisements, publications, promotions, and any other articles in its possession bearing Experian's copyrights;
- e) an order that LSDI be required to account for and pay over to Experian all actual damages suffered by Experian; all gains, profits, and advantages derived by LSDI from LSDI's infringement of Experian's intellectual property, and such damages as the Court shall deem proper within the Copyright Act;

- f) an order that LSDI pay Experian actual or statutory damages, pursuant to 17 U.S.C. § 504(a)–(c);
- g) a judgment that LSDI's infringement of Experian's copyrights has been willful;
- h) an award of increased damages to fully compensate Experian and punitive damages for the willful and wanton nature of LSDI's wrongful acts; and
- i) any and all such other and further relief as this Court deems fair and equitable.

**COUNT II**  
**Trade Secret Misappropriation**

52. Experian incorporates by reference the allegations of Paragraphs 1–51 of this Complaint as though fully set forth herein.

53. Experian's ConsumerView Database and the consumer information it contains have significant commercial and pecuniary value. Experian's ConsumerView Database is the property of Experian. The ConsumerView Database, and the consumer information within the ConsumerView Database, derive independent economic value from not being generally known or readily ascertainable by others and, as such, is an Experian trade secret.

54. Experian and its affiliated entities used reasonable efforts to maintain and safeguard the secrecy of the consumer information in the ConsumerView Database, including the selection, coordination, and aggregation of information in the ConsumerView Database.

55. LSDI wrongfully possessed, used, and distributed the consumer information stored in the ConsumerView Database without Experian's consent or authorization.

56. LSDI knows or has reason to know that the Accused Database was acquired by improper means.

57. LSDI licensed, sold, or otherwise provided data from the ConsumerView Database to others including Natimark. LSDI's conduct described herein constitutes trade secret misappropriation under the New Jersey Trade Secret Act, N.J.S.A 56:15-1 et seq.

58. LSDI's conduct has caused irreparable harm to Experian that cannot be easily ascertained.

59. Unless enjoined by the Court, LSDI will continue to do the acts complained of herein and cause damage and injury, all to Experian's irreparable harm and LSDI's unjust enrichment.

### **Prayer for Relief**

Experian respectfully requests that the Court enter judgment in favor of Experian and against LSDI granting the following relief:

- a) a judgment that LSDI has unfairly competed with Experian by misappropriating Experian's property and trade secrets;
- b) an injunction against LSDI, its officers, agents, servants, employees, successors, assigns, parents, subsidiaries, affiliated or related companies, attorneys, and all others in active concert or participation with LSDI or who receive notice of such injunction, permanently enjoining and restraining them from possessing or maintaining Experian's property and trade secrets and from making, selling, or advertising products which include or are based in part on Experian's property or trade secrets;
- c) an order that LSDI pay Experian actual damages and recompense Experian for the unjust enrichment connected to LSDI's unfair competition;

- d) an order that LSDI pay Experian exemplary damages and attorneys' fees for LSDI's willful and malicious misappropriation of Experian's property and trade secrets; and
- e) any and all such other and further relief as this Court deems fair and equitable.

**COUNT III**  
**Common Law Unfair Competition for Misappropriation**

60. Experian incorporates by reference the allegations of Paragraphs 1–51 of this Complaint as though fully set forth herein.

61. Experian's ConsumerView Database and the consumer information it contains have significant commercial and pecuniary value. Experian expended significant time, labor, money, and creative resources in creating the ConsumerView Database. Experian's ConsumerView Database is the property of Experian.

62. LSDI wrongfully possessed, used, and distributed the consumer information stored in the ConsumerView Database without Experian's consent or authorization.

63. LSDI licensed, sold, or otherwise provided data from the ConsumerView Database to others including Natimark.

64. LSDI has licensed, sold, or otherwise provided data from the ConsumerView Database to others in competition with Experian and Experian's customers. LSDI has caused and continues to cause Experian commercial injury by the acts described herein.

65. LSDI's conduct has caused irreparable harm to Experian that cannot be easily ascertained.

66. LSDI's conduct described herein constitutes unfair competition under New Jersey common law.

67. Unless enjoined by the Court, LSDI will continue to do the acts complained of herein and cause damage and injury, all to Experian's irreparable harm and LSDI's unjust enrichment.

**Prayer for Relief**

Experian respectfully requests that the Court enter judgment in favor of Experian and against LSDI granting the following relief:

- a) a judgment that LSDI has unfairly competed with Experian by misappropriating Experian's property;
  - b) an injunction against LSDI, its officers, agents, servants, employees, successors, assigns, parents, subsidiaries, affiliated or related companies, attorneys, and all others in active concert or participation with LSDI or who receive notice of such injunction, permanently enjoining and restraining them from possessing or maintaining Experian's property and trade secrets and from making, selling, or advertising products which include or are based in part on Experian's property or trade secrets;
  - c) an order that LSDI pay Experian actual damages and recompense Experian for the unjust enrichment connected to LSDI's unfair competition;
- an order that LSDI pay Experian exemplary damages and attorneys' fees for LSDI's willful and malicious misappropriation of Experian's property and trade secrets;
- and
- any and all such other and further relief as this Court deems fair and equitable.
- LSDI licensed, sold, or otherwise provided data from the ConsumerView Database in competition with Experian. LSDI has caused and continues to cause Experian

commercial harm by LSDI's unauthorized exploitation of the ConsumerView Database

**Jury Demand**

Experian demands a trial by jury on all issues properly tried to a jury.

DATED this 11th day of May 2014

By: //s//Stephen R. Buckingham

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*Attorneys for Plaintiff, Experian Information Solutions, Inc.*

**NOTICE OF OTHER ACTIONS PURSUANT TO L. CIV. R. 11.2**

The undersigned hereby certifies that the matter in controversy is not the subject of any other action or proceeding in any court or of a pending arbitration proceeding, with the exception that the following action involves some common facts and a customer of Defendant List Services Direct, Inc., but Defendant List Services Direct, Inc. is not a party to the action: *Experian Information Solutions, Inc. v. Nationwide Marketing Services, Inc.*, Case No. 13-CV-00618-SPL, pending in the United States District Court for the District of Arizona.

//s// *Stephen R. Buckingham*  
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## **EXHIBIT 1**

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Register of Copyrights, United States of America

**Registration Number**

**TX 7-499-062**

**Effective date of registration:**

March 26, 2012

## Title

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**Title of Work:** Group registration for automated database titled: InSource Database; complete database and published updates from 7/1/2011 to 9/30/2011; Representative publication date: 8/24/2011; updated sometimes daily.

## Completion/Publication

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**Year of Completion:** 2011

**Date of 1st Publication:** September 30, 2011

**Nation of 1st Publication:** United States

## Author

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- **Author:** Experian Information Solutions, Inc.
- **Author Created:** selection, coordination, arrangement and compilation of data in database
- **Work made for hire:** Yes
- **Citizen of:** United States
- **Domiciled in:** United States

## Copyright claimant

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**Copyright Claimant:** Experian Information Solutions, Inc.  
475 Anton Blvd, Costa Mesa, CA, 92626, United States

## Limitation of copyright claim

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**Material excluded from this claim:** public domain data

**New material included in claim:** selection, coordination, arrangement and compilation of data in database plus all updates and revisions from 7/1/2011 to 9/30/2011

## Certification

---

**Name:** Luke W. DeMarte

**Date:** November 11, 2011

**Applicant's Tracking Number:** 017721-9400

---

**Correspondence:** Yes

**Registration #:** TX0007499062

**Service Request #:** 1-685172301



Jeffrey H. Brown  
Michael Best & Friedrich LLP  
180 N. Stetson, Suite 2000  
Chicago, IL 60601

## **EXHIBIT 2**

## Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Register of Copyrights, United States of America

Registration Number

**TX 7-907-664**

Effective date of  
registration:

April 10, 2014

### Title

**Title of Work:** Group registration for automated database titled ConsumerView Database (formerly known as InSource Database)-- Published updates from 10/1/2011 to 12/31/2011

### Completion/Publication

**Year of Completion:** 2011

**Date of 1st Publication:** December 31, 2011

**Nation of 1st Publication:** United States

### Author

**Author:** Experian Information Solutions, Inc.

**Author Created:** selection, coordination, arrangement and compilation of data in database

**Work made for hire:** Yes

**Citizen of:** United States

**Domiciled in:** United States

### Copyright claimant

**Copyright Claimant:** Experian Information Solutions, Inc.

475 Anton Blvd, Costa Mesa, CA, 92626, United States

### Limitation of copyright claim

**Material excluded from this claim:** public domain data; database prior to 10/1/2011

**Previous registration and year:** TX 7-499-062 2012

**New material included in claim:** daily revisions; selection, coordination, arrangement and compilation of data in database from 10/1/2011 to 12/31/2011

### Certification

**Name:** Luke W. DeMarte

**Date:** April 10, 2014

**Applicant's Tracking Number:** 017721-9539

**Registration #:** TX0007907664

**Service Request #:** 1-1351302212



Luke W. DeMarte  
Michael Best & Friedrich LLP  
180 N. Stetson, Suite 2000  
Chicago, IL 60601

## Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Register of Copyrights, United States of America

Registration Number  
**TX 7-904-696**

Effective date of  
registration:  
April 10, 2014

### Title

**Title of Work:** Group registration for automated database titled ConsumerView Database formerly known as InSource Database--- Published updates from 1/1/2012 to 3/31/2012

### Completion/Publication

**Year of Completion:** 2012

**Date of 1st Publication:** March 31, 2012

**Nation of 1st Publication:** United States

### Author

**Author:** Experian Information Solutions, Inc.

**Author Created:** selection, coordination, arrangement and compilation of data in database

**Work made for hire:** Yes

**Citizen of:** United States

**Domiciled in:** United States

### Copyright claimant

**Copyright Claimant:** Experian Information Solutions, Inc.

475 Anton Blvd, Costa Mesa, CA, 92626, United States

### Limitation of copyright claim

**Material excluded from this claim:** public domain data; database prior to 1/1/2012

**Previous registration and year:** TX 7-499-062 2012

**New material included in claim:** daily revisions; selection, coordination, arrangement and compilation of data in database from 1/1/2012 to 3/31/2012

### Certification

**Name:** Luke W. DeMarte

**Date:** April 10, 2014

**Applicant's Tracking Number:** 017721-9539

**Registration #:** TX0007904696

**Service Request #:** 1-1351511656



Luke W. DeMarte  
Michael Best & Friedrich LLP  
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## Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

A handwritten signature in black ink that reads "Maria A. Pallante".

Register of Copyrights, United States of America

**Registration Number**  
**TX 7-904-681**

**Effective date of registration:**  
April 10, 2014

### Title

**Title of Work:** Group registration for automated database titled ConsumerView Database formerly known as InSource Database -- Published updates from 4/1/2012 to 6/30/2012

### Completion/Publication

**Year of Completion:** 2012

**Date of 1st Publication:** June 30, 2012

**Nation of 1st Publication:** United States

### Author

■ **Author:** Experian Information Solutions, Inc.  
**Author Created:** selection, coordination, arrangement and compilation of data in database

**Work made for hire:** Yes

**Citizen of:** United States

**Domiciled in:** United States

### Copyright claimant

**Copyright Claimant:** Experian Information Solutions, Inc.

475 Anton Blvd, Costa Mesa, CA, 92626, United States

### Limitation of copyright claim

**Material excluded from this claim:** public domain data; database prior to 4/1/2012

**Previous registration and year:** TX 7-499-062 2012

**New material included in claim:** daily revisions; selection, coordination, arrangement and compilation of data in database from 4/1/2012 to 6/30/2012

### Certification

**Name:** Luke W. DeMarte

**Date:** April 10, 2014

**Applicant's Tracking Number:** 017721-9539

**Registration #:** TX0007904681

**Service Request #:** 1-1351511702



Luke W. DeMarte  
Michael Best & Friedrich LLP  
180 N. Stetson, Suite 2000  
Chicago, IL 60601

## Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Register of Copyrights, United States of America

Registration Number  
**TX 7-907-903**

Effective date of  
registration:  
April 10, 2014

### Title

**Title of Work:** Group registration for automated database titled ConsumerView Database (formerly known as InSource Database)-- Published updates from 7/1/2012 to 9/30/2012

### Completion/Publication

**Year of Completion:** 2012

**Date of 1st Publication:** September 30, 2012

**Nation of 1st Publication:** United States

### Author

**Author:** Experian Information Solutions, Inc.  
**Author Created:** selection, coordination, arrangement and compilation of data in database

**Work made for hire:** Yes

**Citizen of:** United States

**Domiciled in:** United States

### Copyright claimant

**Copyright Claimant:** Experian Information Solutions, Inc.

475 Anton Blvd, Costa Mesa, CA, 92626, United States

### Limitation of copyright claim

**Material excluded from this claim:** public domain data; database prior to 7/1/2012

**Previous registration and year:** TX 7-499-062 2012

**New material included in claim:** daily revisions; selection, coordination, arrangement and compilation of data in database from 7/1/2012 to 9/30/2012

### Certification

**Name:** Luke W. DeMarte

**Date:** April 10, 2014

**Applicant's Tracking Number:** 017721-9539

**Registration #:** TX0007907903

**Service Request #:** 1-1351511797



Luke W. DeMarte  
Michael Best & Friedrich LLP  
180 N. Stetson, Suite 2000  
Chicago, IL 60601

## Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

A handwritten signature in black ink that reads "Maria A. Pallante".

Register of Copyrights, United States of America

**Registration Number**  
**TX 7-907-879**

**Effective date of registration:**  
April 10, 2014

### Title

**Title of Work:** Group registration for automated database titled ConsumerView Database (formerly known as InSource Database)-- Published updates from 10/1/2012 to 12/31/2012

### Completion/Publication

**Year of Completion:** 2012

**Date of 1st Publication:** December 31, 2012

**Nation of 1st Publication:** United States

### Author

**Author:** Experian Information Solutions, Inc.

**Author Created:** selection, coordination, arrangement and compilation of data in database

**Work made for hire:** Yes

**Citizen of:** United States

**Domiciled in:** United States

### Copyright claimant

**Copyright Claimant:** Experian Information Solutions, Inc.

475 Anton Blvd, Costa Mesa, CA, 92626, United States

### Limitation of copyright claim

**Material excluded from this claim:** public domain data; database prior to 10/1/2012

**Previous registration and year:** TX 7-499-062 2012

**New material included in claim:** daily revisions; selection, coordination, arrangement and compilation of data in database from 10/1/2012 to 12/31/2012

### Certification

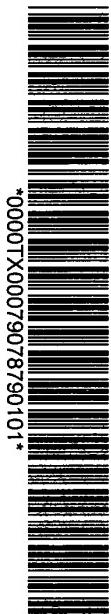
**Name:** Luke W. DeMarte

**Date:** April 10, 2014

**Applicant's Tracking Number:** 017721-9539

**Registration #:** TX0007907879

**Service Request #:** 1-1351511892



Luke W. DeMarte  
Michael Best & Friedrich LLP  
180 N. Stetson, Suite 2000  
Chicago, IL 60601

## Certificate of Registration



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A handwritten signature in black ink that reads "Maria A. Pallante".

Register of Copyrights, United States of America

**Registration Number**  
**TX 7-907-872**

**Effective date of registration:**  
April 10, 2014

### Title

**Title of Work:** Group registration for automated database titled ConsumerView Database (formerly known as InSource Database)--Published updates from 1/1/2013 to 3/31/2013

### Completion/Publication

**Year of Completion:** 2013

**Date of 1st Publication:** March 31, 2013

**Nation of 1st Publication:** United States

### Author

■ **Author:** Experian Information Solutions, Inc.  
**Author Created:** selection, coordination, arrangement and compilation of data in database

**Work made for hire:** Yes

**Citizen of:** United States

**Domiciled in:** United States

### Copyright claimant

**Copyright Claimant:** Experian Information Solutions, Inc.

475 Anton Blvd, Costa Mesa, CA, 92626, United States

### Limitation of copyright claim

**Material excluded from this claim:** public domain data; database prior to 1/1/2013

**Previous registration and year:** TX 7-499-062 2012

**New material included in claim:** daily revisions; selection, coordination, arrangement and compilation of data in database from 1/1/2013 to 3/31/2013

### Certification

**Name:** Luke W. DeMarte

**Date:** April 10, 2014

**Applicant's Tracking Number:** 017721-9539

**Registration #:** TX0007907872

**Service Request #:** 1-1351511977



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Michael Best & Friedrich LLP  
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## Certificate of Registration



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A handwritten signature in black ink that reads "Maria A. Pallante".

Register of Copyrights, United States of America

**Registration Number**  
**TX 7-907-680**

**Effective date of registration:**  
April 10, 2014

### Title

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**Title of Work:** Group registration for automated database titled ConsumerView Database (formerly known as InSource Database)- Published updates from 4/1/2013 to 6/30/2013

### Completion/Publication

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**Year of Completion:** 2013

**Date of 1st Publication:** June 30, 2013

**Nation of 1st Publication:** United States

### Author

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- **Author:** Experian Information Solutions, Inc.
- **Author Created:** selection, coordination, arrangement and compilation of data in database

**Work made for hire:** Yes

**Citizen of:** United States

**Domiciled in:** United States

### Copyright claimant

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**Copyright Claimant:** Experian Information Solutions, Inc.  
475 Antón Blvd, Costa Mesa, CA, 92626, United States

### Limitation of copyright claim

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**Material excluded from this claim:** public domain data; database prior to 4/1/2013

**Previous registration and year:** TX 7-499-062 2012

**New material included in claim:** daily revisions; selection, coordination, arrangement and compilation of data in database from 4/1/2013 to 6/30/2013

### Certification

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**Name:** Luke W. DeMarte

**Date:** April 10, 2014

**Applicant's Tracking Number:** 017721-9539

**Registration #:** TX0007907680

**Service Request #:** 1-1351512042



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**EXP007048**

## Certificate of Registration



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A handwritten signature in black ink that reads "Maria A. Pallante".

Register of Copyrights, United States of America

Registration Number  
**TX 7-907-856**

Effective date of  
registration:  
April 10, 2014

### Title

**Title of Work:** Group registration for automated database titled ConsumerView Database (formerly known as InSource Database)-- Published updates from 7/1/2013 to 9/30/2013

### Completion/Publication

**Year of Completion:** 2013

**Date of 1st Publication:** September 30, 2013

**Nation of 1st Publication:** United States

### Author

■ **Author:** Experian Information Solutions, Inc.  
**Author Created:** selection, coordination, arrangement and compilation of data in database

**Work made for hire:** Yes

**Citizen of:** United States

**Domiciled in:** United States

### Copyright claimant

**Copyright Claimant:** Experian Information Solutions, Inc.  
475 Anton Blvd, Costa Mesa, CA, 92626, United States

### Limitation of copyright claim

**Material excluded from this claim:** public domain data; database prior to 7/1/2013

**Previous registration and year:** TX 7-499-062 2012

**New material included in claim:** daily revisions; selection, coordination, arrangement and compilation of data in database from 7/1/2013 to 9/30/2013

### Certification

**Name:** Luke W. DeMarte

**Date:** April 10, 2014

**Applicant's Tracking Number:** 017721-9539

**Registration #:** TX0007907856

**Service Request #:** 1-1351512127



\*0000TX00079078560101\*

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**EXP007050**

## Certificate of Registration



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A handwritten signature in black ink that reads "Maria A. Pallante".

Register of Copyrights, United States of America

Registration Number  
**TX 7-905-619**

Effective date of  
registration:  
April 10, 2014

### Title

**Title of Work:** Group registration for automated database titled ConsumerView Database (formerly known as InSource Database) â€“ Published updates from 10/1/2013 to 12/31/2013

### Completion/Publication

**Year of Completion:** 2013

**Date of 1st Publication:** December 31, 2013      **Nation of 1st Publication:** United States

### Author

■ **Author:** Experian Information Solutions, Inc.

**Author Created:** selection, coordination, arrangement and compilation of data in database

**Work made for hire:** Yes

**Citizen of:** United States

**Domiciled in:** United States

### Copyright claimant

**Copyright Claimant:** Experian Information Solutions, Inc.

475 Anton Blvd, Costa Mesa, CA, 92626, United States

### Limitation of copyright claim

**Material excluded from this claim:** public domain data; database prior to 10/1/2013

**Previous registration and year:** TX 7-499-062    2012

**New material included in claim:** daily revisions; selection, coordination, arrangement and compilation of data in database from 10/1/2013 to 12/31/2013

### Certification

**Name:** Luke W. DeMarte

**Date:** April 10, 2014

**Applicant's Tracking Number:** 017721-9539